

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA :
 :
v. : Criminal No. 1:21CR158 (LMB)
 : The Hon. Leonie M. Brinkema
ASHLEY KOLHOFF :
Defendant :
 :

MOTION FOR APPROPRIATE RELIEF

COMES NOW ASHLEY KOLHOFF, Defendant in the above styled case, by and through Counsel, and hereby moves this Court for an appropriate Order delaying her transfer to a BOP facility for 30 days so that she may receive the COVID-19 vaccine from the Alexandria Detention Center. Based on discussions with Ms. Kolhoff, Counsel understands that a delay of no more than 30 days should be sufficient. In support of this Motion, the following is offered for the Court's consideration:

1. The Court sentenced Ms. Kolhoff on July 12, 2022.
2. Ms. Kolhoff is now, and has been, on the COVID-19 vaccine waiting list at ADC.
3. Ms. Kolhoff understands that she is due to receive the vaccine within the next 30 days.
4. Given the dangers associated with COVID, especially within BOP facilities, Ms. Kolhoff wishes to be vaccinated prior to her transfer, a request that seems eminently reasonable.

WHEREFORE, for the premises considered, Ms. Kolhoff requests the relief sought herein and any further relief the Courts deems just.

Respectfully Submitted,

ASHLEY KOLHOFF
By Counsel

/s/
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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of July, 2022, I electronically filed the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the parties of record.

/s/ Christopher Amolsch
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